

EXHIBIT A

MONROE COUNTY CLERK'S OFFICE

THIS IS NOT A BILL. THIS IS YOUR RECEIPT.

Receipt # 3581569

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No. Pages: 5

Instrument: EFILING INDEX NUMBER

Control #: 202309261733

Index #: E2023011031

Date: 09/26/2023

Time: 4:49:55 PM

Return To:
CHARLENE S. FALLON

Kruzinski, Mary

Old Dominion Freight Line, Inc.

State Fee Index Number	\$165.00	
County Fee Index Number	\$26.00	
State Fee Cultural Education	\$14.25	
State Fee Records Management	\$4.75	Employee: CW
Total Fees Paid:	\$210.00	

State of New York

MONROE COUNTY CLERK'S OFFICE
WARNING – THIS SHEET CONSTITUTES THE CLERKS
ENDORSEMENT, REQUIRED BY SECTION 317-a(5) &
SECTION 319 OF THE REAL PROPERTY LAW OF THE
STATE OF NEW YORK. DO NOT DETACH OR REMOVE.

JAMIE ROMEO

MONROE COUNTY CLERK



SUPREME COURT
STATE OF NEW YORK

COUNTY OF MONROE

MARY KRUZINSKI,

Plaintiff,

SUMMONS

-against-

Index #:
Date Filed:

OLD DOMINION FREIGHT LINE, INC.,

Defendant.

TO THE ABOVE-NAMED DEFENDANT:

YOU ARE HEREBY SUMMONED and required to serve upon Plaintiff's attorney an Answer to the Complaint in this action within twenty (20) days after the service of this Summons, exclusive of the day of service, or within thirty (30) days after service is complete if this Summons is not personally delivered to you within the State of New York. In case of your failure to Answer, Judgment will be taken against you by default for the relief demanded in the Complaint.

DATED: September 26, 2023


Charlene S. Fallon, Esq.
BLANCHFIELD & FALLON, LLP
Attorneys for Plaintiff
41 State Street, Suite M100
Albany, New York 12207
Telephone: (518) 436-4142

Trial is desired in the County of Monroe
Venue is based on the location of the incident
at 1948 W. Ridge Road, Greece, New York
14626, which is in the County of Monroe,
State of New York.

SUPREME COURT
STATE OF NEW YORK

COUNTY OF MONROE

MARY KRUZINSKI,

Plaintiff,

-against-

COMPLAINT

Index #:

Date Filed:

OLD DOMINION FREIGHT LINE, INC.,

Defendant.

Plaintiff, Mary Kruzinski, by and through her attorneys, Blanchfield & Fallon, LLP, as and for a Complaint does state and allege upon information and belief:

1. At all times hereinafter mentioned the plaintiff, Mary Kruzinski, was and is a resident of the County of Monroe, State of New York.
2. At all times hereinafter mentioned, the defendant, Old Dominion Freight Line, Inc., was and still is a foreign business corporation, duly organized and operating under the laws of New York State.
3. At all times hereinafter mentioned, the defendant, Old Dominion Freight Line, Inc., was present and doing business in the State of New York, and transacted, solicited, and conducted business in the State of New York and derived substantial revenue from such business.
4. At all times hereinafter mentioned the plaintiff was employed by Five Guys, a fast-food restaurant located at 1948 W. Ridge Rd., Greece, NY 14626.
5. At all times hereinafter mentioned the plaintiff's employer, Five Guys had a contract and/or other agreement/arrangement with the defendant, Old Dominion Freight Line, Inc., for the delivery of a shelving unit to the location at 1948 W. Ridge Rd., Greece, NY 14626.

6. At all times hereinafter mentioned the defendant, Old Dominion Freight Line, Inc., by and/or through its agents, servants and/or employees (hereinafter collectively, "Old Dominion"), undertook to deliver to Five Guys at 1948 W. Ridge Rd., Greece, NY 14626 a shelving unit.

7. That on or about November 3, 2020, the defendant, Old Dominion placed the shelving unit upon a pallet jack for delivery to said Five Guys.

8. That on or about November 3, 2020, the plaintiff through the course of her employment with Five Guys, undertook to receive the shelving unit from the defendant, Old Dominion.

9. That on or about November 3, 2020, the defendant, Old Dominion, while delivering the shelving unit to Five Guys negligently dropped the pallet jack onto the plaintiff's right foot.

10. That on or about November 3, 2020, the defendant, Old Dominion operated the pallet jack in a negligent and reckless manner causing the plaintiff to suffer serious personal injury.

11. Solely as a result of the negligence of the defendant, Old Dominion, the plaintiff sustained serious and severe injuries to her person, without any negligence on the part of the plaintiff contributing thereto.

12. That solely by reason of the aforesaid injury and the negligence of the defendant, the plaintiff sustained serious personal injuries, suffered immense pain and suffering, past and future medical expenses and other expenses and damages all to the plaintiff's damage in a sum that exceeds the jurisdictional limits of all lower courts.

WHEREFORE, plaintiff demands judgment against the defendant, for the pain, suffering, medical expenses and other damages together with the costs and disbursements of this action, plus any other and further relief to which this Court may seem just and proper.

DATED: September 26, 2023


BLANCHFIELD & FALLON, LLP
BY: Charlene S. Fallon, Esq.
Attorneys for the Plaintiff
41 State Street, Suite M100
Albany, NY 12207
(518) 436-4142